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10 UNITED STATES DISTRICT COURT

11 DISTRICT OF ARIZONA

12 In Re Bard IVC Filters Products
13 Liability Litigation

14 No. MD-15-02641-PHX-DGC

15 **MOTION FOR LEAVE TO FILE UNDER
SEAL PLAINTIFFS' RESPONSE TO
BARD'S SUBMISSION RE SELECTION
OF CASES FOR DISCOVERY GROUP 1
and
MOTION TO SEAL FILED
DOCUMENTS**

18 Plaintiffs move this Court for an Order pursuant to the Stipulated Protective Order
19 (Doc. 268), Federal Rule of Civil Procedure 26(c)(1)(G), and Local Civil Rule 5.6, sealing
20 Plaintiffs' Response to Bard's Submission re Selection of Cases for Discovery Group 1.
21 Plaintiffs' Response contains personal healthcare information that is protected under
22 HIPAA and confidential under the Stipulated Protective Order, warranting protection
23 from public disclosure.

24 Plaintiffs also move this Court to seal Plaintiffs' Submission re Proposed List of
25 Additional Discovery Group 1 Cases (Doc. 4336), Defendants' Submission in Opposition
26 to Plaintiffs' Proposed List of Additional Discovery Group 1 Cases (Doc. 4342), and
27 Defendants' Submission re Discovery Group 1 (Doc. 4341) as these documents also

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1 contain personal healthcare information regarding various plaintiffs that is protected under
2 HIPAA and confidential under the Stipulated Protective Order.

3 Bard does not oppose this Motion.

4 For the foregoing reasons, this Court should grant Plaintiffs' leave to file their
5 Response under seal and to seal Document numbers 4336, 4342, and 4341.

6 RESPECTFULLY SUBMITTED this 27th day of December 2016.

7 GALLAGHER & KENNEDY, P.A.

8 By:/s/ Paul L. Stoller

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19 **CERTIFICATE OF SERVICE**

20 I hereby certify that on this 27th day of December, 2016, I electronically
21 transmitted the attached document to the Clerk's Office using the CM/ECF System for
22 filing and transmittal of a Notice of Electronic Filing.

23 /s/ Deborah Yanazzo

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